

January 16, 2002

The Honorable Christine Todd Whitman
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on Cytec's HPV Test Plan and Robust Summary for 2-Amino-2,3-dimethylbutanenitrile

Dear Administrator Whitman:

The following comments on Cytec Industries Inc.'s test plan for 2-amino-2,3-dimethylbutanenitrile are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than nine million Americans.

Cytec has submitted a comprehensive analysis and has appropriately concluded that no additional testing is necessary under the High Production Volume (HPV) Chemical Challenge. Cytec has provided a detailed description of why 2-amino-2,3-dimethylbutanenitrile meets the criteria for a closed system intermediate, as delineated in the EPA Guidance Document for Testing Closed System Intermediates for the HPV Challenge Program. Therefore, no testing should be proposed on this chemical according to term 9(a) of the October 1999 Agreement among the EPA, industry, and health, environmental, and animal protection organizations which states:

9(a) Testing of closed system intermediates, which present less risk of exposure, shall be deferred until 2003.

Due to the low likelihood of human exposure, the EPA recommends a reduced testing scheme for closed system intermediates. Cytec has demonstrated that any testing on 2-amino-2,3-dimethylbutanenitrile would not expand the understanding of the health hazards associated with this chemical.

We suggest that Cytec's overall toxicological analysis would be improved if Cytec coordinates with other HPV sponsors of aliphatic nitriles. The October 1999 Agreement among the EPA, industry, and health, environmental, and animal protection organizations states that:

3. Participants shall maximize the use of scientifically appropriate categories of related chemicals and structure activity relationships.

Some examples of such chemicals that could have been addressed in this analysis include low molecular-weight aliphatic nitriles such as 2-methylactonitrile (CAS #75865, sponsored under the SIDS program), isobutyronitrile (CAS #75865, sponsored by Eastman Chemical Company), and butanenitrile (CAS #109740, sponsored by Eastman Chemical Company), and the dinitrile category (sponsored by DuPont). The EPA needs to encourage this type of inter-industry communication and cooperation.

Cytec considers 2-amino-2,3-dimethylbutanenitrile to be acutely toxic and already invokes strict safety practices associated with the manufacturing, handling, and transporting of this chemical. As described previously in our comments on DuPont's test plan for the dinitrile category, nitrile compounds are generally skin and eye irritants and can degrade or be metabolized to cyanide, a well-known, highly toxic chemical.

We commend Cytec for its comprehensive analysis on 2-amino-2,3-dimethylbutanenitrile and application of thoughtful toxicology. However, we suggest that the analysis could be improved by including other structurally similar HPV chemicals.

Thank you for your attention to these comments. I can be reached at 202-686-2210, ext. 302, or via e-mail at ncardello@pcrm.org.

Sincerely,

Nicole Cardello, M.H.S.
Staff Scientist